

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 24-MJ-02936-Torres

UNITED STATES OF AMERICA

v.

WISLANDE JEAN BAPTISTE

Defendant.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? **No.**
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? **No.**
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? **No.**
4. Did this matter involve the participation of or consultation now Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? **No.**

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By: /s/ Timothy J. Farina
Timothy J. Farina
Assistant United States Attorney
Court ID No. A5503150
99 Northeast 4th Street
Miami, Florida 33132
Telephone: (305) 961-9196
Email: Timothy.Farina@usdoj.gov

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Florida

United States of America
v.
WISLANDE JEAN BAPTISTE,

Case No. 24-MJ-02936-Torres

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 10, 2024, in the county of Miami-Dade in the
Southern District of Florida, the defendant(s) violated:

Code Section
31 U.S.C. § 5332

Offense Description
Bulk Cash Smuggling

This criminal complaint is based on these facts:
SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.

Complainant's signature ID#7660

Jose Garcia, Special Agent, HSI
Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Telephone

Date: May 12, 2024

Judge's signature

City and state: Miami, Florida

Honorable Edwin G. Torres, United States Chief Magistrate Judge
Printed name and title

AFFIDAVIT

I, Jose Garcia, being first duly sworn, do here by depose and state that:

BACKGROUND

1. I am employed as a Special Agent with the Immigrations and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”), Special Agent in Charge, Miami, Florida. I have been employed as a Special Agent since 2009. As a Special Agent, my responsibilities include conducting investigations of firearms violations, manufacturing, distributing or possession of controlled substances, importation of controlled substances, smuggling of goods into the United States, and related offenses.

2. I have been trained in conducting investigations related to narcotics smuggling, interdiction and distribution activities. I am currently assigned to the Border Enforcement Security Taskforce, where I conduct investigations related to violations of Titles 8, 18, 19, 21 and 31 of the United States Code.

3. This Affidavit is submitted in support of a criminal complaint that charges Wislande JEAN BAPTISTE (“JEAN BAPTISTE”) with knowingly concealing more than ten thousand dollars (\$10,000.00) in United States currency, that is approximately forty-four thousand, seven hundred and seventy-nine dollars (\$44,779.00) in United States currency, and transporting and attempting to transport such currency from a place inside the United States to a place outside of the United States, in violation of Title 31, United States Code, Section 5332(a).

4. The information set forth in this Affidavit comes from my personal involvement in this investigation, as well as from information provided to me by other law enforcement officers and people with knowledge of the case. This Affidavit does not reflect every fact law

enforcement knows about this investigation but is submitted for the limited purpose of establishing probable cause for the criminal complaint against JEAN BAPTISTE.

PROBABLE CAUSE

5. On or about May 10, 2024, JEAN BAPTISTE attempted to depart the United States via the Miami International Airport on board American Airlines Flight #987 to Santo Domingo, Dominican Republic. U.S. Customs and Border Protection (“CBP”) Officers conducted an outbound customs examination and field interview of JEAN BAPTISTE as she was attempting to board the plane. A CBP Officer asked JEAN BAPTISTE if she had any currency over \$10,000.00 to declare. JEAN BAPTISTE responded that she did not. JEAN BAPTISTE then completed a written Customs declaration via a pre-printed form, stating she was in possession of six thousand dollars (\$6,000.00) in United States currency.

6. During this encounter, JEAN BAPTISTE presented CBP officers with five thousand, one hundred and ninety dollars (\$5,190.00) in United States currency.

7. CBP Officers then inspected JEAN BAPTISTE’s luggage, which she confirmed to CBP officers belonged to her. During this inspection, officers discovered an additional thirty-nine thousand, five hundred and eighty-nine dollars (\$39,589.00) in United States currency. This currency was concealed within her checked luggage and was wrapped in paper towels and further concealed inside a plastic bag bonded by glue.

8. When Officers discovered the currency concealed in her luggage, JEAN BAPTISTE spontaneously stated that she did not declare the concealed currency because she did not think officers would find it.

9. JEAN BAPTISTE was read her *Miranda* Rights and agreed to speak to law enforcement. Post-*Miranda*, JEAN BAPTISTE admitted to being in possession of forty-four

thousand, seven hundred and seventy-nine dollars (\$44,779.00) in United States currency. JEAN BAPTISTE further admitted that the currency found in her luggage had been concealed. JEAN BAPTISTE again told officers that she did not declare the currency concealed in her luggage because she did not think anyone would discover it.

CONCLUSION

10. I respectfully submit there is probable cause to believe that on or about May 10, 2024, JEAN BAPTISTE knowingly concealed more than ten thousand dollars (\$10,000) in United States currency, and attempted to transport or transfer such currency or monetary instruments from a place within the United States to a place outside of the United States, in violation of Title 31, United States Code, Section 5332.

FURTHER AFFIANT SAYETH NAUGHT.



JOSE GARCIA
SPECIAL AGENT
HOMELAND SECURITY INVESTIGATIONS

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1
by Telephone this 12 day of May 2024.



HONORABLE JUDGE EDWIN G. TORRES
UNITED STATES CHIEF MAGISTRATE JUDGE